

Columbia-Snake River Irrigators Association

Policy Memorandum

DATE: May 2, 2013

TO: Mr. Steve Oliver, and Mr. Rick Pendergrass
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FROM: Ron Reimann, President, CSRIA
Darryll Olsen, Ph.D., CSRIA Board Representative

SUBJECT: CSRIA Comments on the Columbia River Treaty Review “Iterations”

The CSRIA opposes new Columbia River Treaty obligations that would directly or indirectly bound the U.S. Federal Columbia River hydropower and water management agencies to further fish “mitigation” measures; or create new “Ecosystem Management” stipulations that further restrict hydroelectric power production or bar new, incremental increases to water supply diversions for industrial, municipal, or high-efficiency irrigation purposes.

As you know, the Federal River System operators, through BPA rates and system opportunity costs, already contribute roughly \$1 billion annually to the current Fish & Wildlife Program and BiOp-ESA operations; and the non-federal parties spend tens-of-millions of dollars annually to comply with their respective project licensing requirements.

More importantly, credible technical analyses probing hydro project operations and flow regimes (targets) do not offer any compelling evidence that more money or water will lead to any additional, or empirically measurable, benefits to Mainstem fish survival.¹

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¹ See more recently, R. Hilborn (April 2013), PNAS, “Ocean and Dam Influences on Salmon Survival,” and B.J. Burke (January 2013), NOAA Fisheries-BPA Funded Research, “Multivariate Models of Adult Pacific Salmon Returns.” These studies echo the findings of several previous-decade NOAA Fisheries and private sector studies related to dam passage and flow-survival studies.

The vast volume of technical analyses currently point toward high project/pool fish passage survival, a successful juvenile salmon/steelhead transportation program, and very limited—sometimes nonexistent—benefits to spring-summer migrants from Mainstem flow regimes. In effect, the present Columbia-Snake Mainstem river system may offer a more favorable fish survival environment than non-dammed river systems, such as the Fraser River. And in previous technical reviews like the *Inter-Basin Comparison Study (1996 and 2004)*, the evidence is conclusive that ocean conditions predominantly overshadow fish survival, whereas “direct hydropower system survival has little influence on SAR” (fish life-cycle survival values, as previously reviewed by Muir, Smith, Williams, and Marsh, NOAA Fisheries, 2006-07).

With science- and economics-based certainty, CSRIA does not support higher costs imposed on hydropower and water management via amendments to the Columbia River Treaty. Higher social and economic costs should not be considered as an acceptable trade-off relative to illusionary fish/environmental benefits. This factor should be more appreciable given the crippling debt burdens now facing our nation and state.

Should you desire additional comments clarifying our concerns, or request direct consultations, please contact us at 509-783-1623.

cc:

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And Other Interested Parties